

FEB 21 2018

HUNTER C. DUDLEY, CLERK  
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IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION  
FEBRUARY 2019 SESSION

UNITED STATES OF AMERICA

: Case No.:

6:19CR5

v.

: **SEALED INDICTMENT**

JANIKA BARKSDALE

: In violation of:

: 18 U.S.C. § 371

: 18 U.S.C. §§ 922(a)(6), 924(a)(2)

The Grand Jury Charges that:

**COUNT ONE**

1. From in or about October 2017 and continuing thereafter until in or about December 2018, in the Western District of Virginia, and elsewhere, defendant, JANIKA BARKSDALE, knowingly and willfully conspired and agreed with another, to commit an offense against the United States, that is to knowingly make false and fictitious written statements to licensed firearms dealers, within the meaning of Chapter 44, Title 18, United States Code, in connection with the acquisition of multiple firearms which statements were intended and likely to deceive the licensed firearms dealers, as to a fact material to the lawfulness of such sales of said firearms to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearms, in violation of Title 18 United States Code, Sections 922(a)(6) and 924(a)(2).

## **MANNER AND MEANS OF THE CONSPIRACY**

2. It was a part of the conspiracy that the co-conspirator obtained information about firearms for sale from licensed firearms dealers located in the Western District of Virginia.

3. It was further a part of the conspiracy the co-conspirator would provide instructions to the defendant about which gun(s) he wanted the defendant to buy for him.

4. It was further a part of the conspiracy that the co-conspirator transported the defendant to the licensed firearms dealers to purchase firearm(s) he selected.

5. It was further a part of the conspiracy that the defendant filled out the required paperwork for the purchase of the firearms since the co-conspirator could not legally purchase a firearm because he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

6. It was further a part of the conspiracy that the money for the firearms transactions was provided by the co-conspirator.

7. It was further a part of the conspiracy that firearms purchased by the defendant were transferred to the possession of the co-conspirator.

8. It was further a part of the conspiracy that the co-conspirator paid the defendant for obtaining the firearms for the co-conspirator.

## OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Western District of Virginia and elsewhere:

9. As set forth in the chart below, on or about the following dates the defendant made a false statement to the following licensed firearms dealers that she was the true purchaser of the following firearms:

Date	Firearms	Firearms Dealer, Address, & License No.
October 12, 2017	1 Highpoint 9mm Pistol	Vista Pawn 1000 Main Street, Suite F Altavista, VA 24517 1-54-031-02-7J-14429
October 24, 2017	1 Taurus 40 caliber pistol	Vista Pawn 1000 Main Street, Suite F Altavista, VA 24517 1-54-031-02-7J-14429
October 27, 2017	1 Taurus 40 caliber pistol	Vista Pawn 1000 Main Street, Suite F Altavista, VA 24517 1-54-031-02-7J-14429
November 10, 2017	1 Taurus 9mm pistol 1 SCCY 9mm pistol	Vista Pawn 1000 Main Street, Suite F Altavista, VA 24517 1-54-031-02-7J-14429

All in violation of Title 18, United States Code, Section 371.

## **COUNT TWO**

1. On or about October 12, 2017, in the Western District of Virginia, the defendant, JANIKA BARKSDALE, in connection with the acquisition of a firearm, a Highpoint 9mm pistol, from, Vista Pawn, a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Vista Pawn, which statement was intended and likely to deceive Vista Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, United States Code, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm.

2. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

## **COUNT THREE**

1. On or about October 24, 2017, in the Western District of Virginia, the defendant, JANIKA BARKSDALE, in connection with the acquisition of a firearm, a Taurus 40 caliber pistol, from, Vista Pawn, a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Vista Pawn, which statement was intended and likely to deceive Vista Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, United States Code, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm.

2. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

#### **COUNT FOUR**

1. On or about October 27, 2017, in the Western District of Virginia, the defendant, JANIKA BARKSDALE, in connection with the acquisition of a firearm, a Taurus 40 caliber pistol, from, Vista Pawn, a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Vista Pawn, which statement was intended and likely to deceive Vista Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, United States Code, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm.

2. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

#### **COUNT FIVE**

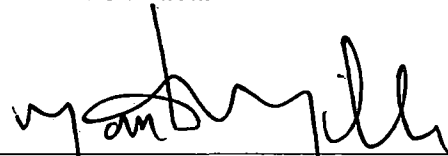
1. On or about November 10, 2017, in the Western District of Virginia, the defendant, JANIKA BARKSDALE, in connection with the acquisition of a firearm, a Taurus 9mm pistol and a SCCY 9mm pistol, from, Vista Pawn, a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Vista Pawn, which statement was intended and likely to deceive Vista Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, United States Code, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that she was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm.

2. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A True Bill this 21<sup>st</sup> day of February 2019.

/s/ FOREPERSON

FOREPERSON

A handwritten signature in black ink, appearing to read "Tom Cullen", written over a horizontal line.

FOR THOMAS T. CULLEN  
UNITED STATES ATTORNEY